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February 15, 2008

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

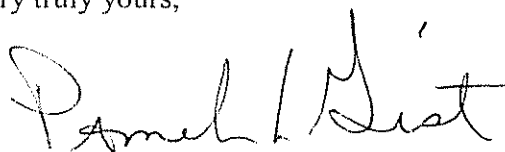
Re: **EB Docket No. 06-36**
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007

Dear Ms. Dortch:

On behalf of Skyline Telephone Membership Corporation and SkyBest Communications, Inc., and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carriers' joint 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enclosures

cc: Enforcement Bureau, FCC (2)
Best Copy and Printing, Inc. (1)



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Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

Re: **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007**
EB Docket No. 06-36

Skyline Telephone Membership Corporation
Form 499 Filer ID: 802392

Skybest Communications, Inc.
Form 499 Filer ID: 821108

CERTIFICATION

I, Michael D. Lewis, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the rules.

Name: Michael D. Lewis
Title: Chief Regulatory Officer
Date: February 15, 2008

Skyline Telephone Membership Corporation Corporation
and Skybest Communications, Inc
1200 NC Highway 194 North
West Jefferson, NC 28694

STATEMENT

Skyline Telephone Membership Corporation and Skybest Communications, Inc. has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Skyline Telephone Membership Corporation and Skybest Communications, Inc. has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Skyline Telephone Membership Corporation and Skybest Communications, Inc. continually educates and trains its employees regarding the appropriate use of CPNI. Skyline Telephone Membership Corporation and Skybest Communications, Inc. has established disciplinary procedures should an employee violate the CPNI procedures established by Skyline Telephone Membership Corporation and Skybest Communications, Inc..
- Skyline Telephone Membership Corporation and Skybest Communications, Inc. maintains a record of its and its wholly owned subsidiary's sales and marketing campaigns that use its customers' CPNI. Skyline Telephone Membership Corporation and Skybest Communications, Inc. also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Skyline Telephone Membership Corporation and Skybest Communications, Inc. has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Skyline Telephone Membership Corporation and Skybest Communications, Inc. compliance for a minimum period of one year. Specifically, Skyline Telephone Membership Corporation and Skybest Communications, Inc.'s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

- Skyline Telephone Membership Corporation and Skybest Communications, Inc. has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations or otherwise and in connection with these procedures, Skyline Telephone Membership Corporation and Skybest Communications, Inc. has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.
- Skyline Telephone Membership Corporation and Skybest Communications, Inc. has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Skyline Telephone Membership Corporation and Skybest Communications, Inc. took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Skyline Telephone Membership Corporation and Skybest Communications, Inc. at a state commission, in the court system, or at the Federal Communications Commission: No action taken.
- The following is information Skyline Telephone Membership Corporation and Skybest Communications, Inc. has with respect to the processes pretexters are using to attempt to access CPNI, and what steps Skyline Telephone Membership Corporation and Skybest Communications, Inc.s are taking to protect CPNI: Skyline Telephone Membership Corporation and Skybest Communications, Inc. is aware that pre-texters pretend to be customers or employees to obtain CPNI. In response, the company has developed a manual and trained full employee base on company's CPNI compliance policies and procedures. The decision to train all employees was based on the possibility for any employee to gain access to CPNI during the performance of their job duties. In addition, all employees have access to the company CPNI manual on the intranet. Additional training was provided to those employees most frequently impacted by new CPNI rules such as members of the customer service and marketing departments.

- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
 - Number of customer complaints Skyline Telephone Membership Corporation and Skybest Communications, Inc. received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 0.
 - Category of complaint:
 - 0 Number of instances of improper access by employees
 - 0 Number of instances of improper disclosure to individuals not authorized to receive the information
 - 0 Number of instances of improper access to online information by individuals not authorized to view the information
 - 0 Number of other instances of improper access or disclosure
 - Description of instances of customer complaints, improper access or disclosure: No instances of improper access or disclosure were identified.